

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FARHAD AZIMA,
ALG TRANSPORTATION, INC.,
MAIN 3260 LLC,
FFV W39 LLC, and
FFV DEVELOPMENT LLC,

Plaintiffs,

v.

DECHERT LLP,
DAVID NEIL GERRARD,
DAVID GRAHAM HUGHES,
NICHOLAS DEL ROSSO,
VITAL MANAGEMENT SERVICES, INC.,
AMIT FORLIT,
INSIGHT ANALYSIS AND RESEARCH LLC,
SDC-GADOT LLC,
AMIR HANDJANI,
ANDREW FRANK, and
KARV COMMUNICATIONS,

Defendants.

Case No. 1:22-cv-08728 (PGG) (JW)

**NOTICE OF DEFENDANT
DAVID NEIL GERRARD'S
MOTION TO DISMISS THE
COMPLAINT**

PLEASE TAKE NOTICE that, upon the Joint Memorandum of Law in Support of Defendants' Motions to Dismiss, the Declaration of John C. Quinn, dated February 28, 2023, and the attached exhibits, the supplemental Memorandum of Law in Support of Defendant David Neil Gerrard's Motion to Dismiss, the Declaration of David Gopstein, dated February 28, 2023, and the accompanying exhibits, the Complaint (Dkt. 1), and all other papers and proceedings herein, Defendant David Neil Gerrard, by and through its counsel, will move this Court before the Honorable Paul G. Gardephe, United States District Judge for the Southern District of New York, 40 Foley Square, Courtroom 705, New York, New York, 10007, at a date and time to be determined by the Court, for an Order, pursuant to Rule 12(b)(2), and (6) of the Federal Rules of

Civil Procedure, and the doctrine of forum non convenience dismissing the Complaint in its entirety with prejudice and granting such other and further relief as this Court may deem just and proper.

Dated: February 28, 2023
New York, New York

/s/ Andrew St. Laurent
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